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2. In 1994, during Plaintiff Eva Denes' employment, Travelers implemented a policy requiring binding arbitration of employment disputes as the final step to the company's internal dispute resolution procedure. By letter dated July 22, 1994 from Travelers Senior Vice President of Human Resources, Thomas Helfrich, all employees were notified through internal company mail of the adoption of the binding arbitration policy and that this policy was a condition of continued employment with Travelers. A true and correct copy of this July 22, 1994 letter is attached hereto as Exhibit A.

3. Travelers Employment Arbitration Policy was thereafter distributed to all employees through internal company mail as part of the employee handbook issued in July 1994. True and correct copies of pertinent excerpts from the 1994 handbook are attached hereto as Exhibit B.

4. In April 1996, during Ms. Denes' employment, Travelers issued a revised employee handbook, with an updated version of Travelers Employment Arbitration Policy. The handbook was distributed to all employees by internal company mail. By way of a cover letter accompanying the handbook, employees were specifically reminded that the handbook included an Employment Arbitration Policy and were advised to review the Employment Arbitration Policy carefully and to call their human resource representative with any questions. True and correct copies of the cover letter from the new Vice President of Human Resources together with pertinent excerpts from the April 1996 handbook are attached hereto as Exhibit C.

5. The 1996 handbook included a section entitled "Principles of Employment," specifically calling employees' attention to Travelers Employment Arbitration Policy and notifying them that continued employment constitutes acceptance of the Employment Arbitration Policy. A true and correct copy of the Principles of Employment is attached hereto as Exhibit D.

6. In January 1998, during Ms. Denes' employment, Travelers again issued an updated employee handbook and Employment Arbitration Policy, which were distributed to all employees through interoffice mail. As with prior handbooks, the 1998 handbook was accompanied by a cover letter to employees specifically calling their attention to the Employment Arbitration Policy in the handbook. True and correct copies of the cover letter and pertinent excerpts from the handbook are attached hereto as Exhibit E.

1 7. In approximately August 2001, during Ms. Denes' employment, Travelers again
2 issued a revised handbook. This edition of the handbook contained an updated Employment
3 Arbitration Policy and was distributed to all employees via the Company's interoffice mail system.
4 True and correct copies of the accompanying cover letter and relevant excerpts from the handbook
5 are attached hereto as Exhibit F.

6 8. In August 2002, during Ms. Denes' employment, Travelers issued another revised
7 handbook, similarly containing an Employment Arbitration Policy. These materials were
8 distributed to all employees via the Company's interoffice mail system. True and correct copies of
9 pertinent excerpts from the 2002 handbook are attached hereto as Exhibit G.

10 9. In April 2003, during Ms. Denes' employment, Travelers again issued a revised
11 handbook, similarly containing the Employment Arbitration Policy. These materials were
12 distributed to all employees via the Company's interoffice mail system. True and correct copies of
13 pertinent excerpts from the 2003 handbook are attached hereto as Exhibit H.

14 10. In February 2004, during Ms. Denes' employment, Travelers again issued a revised
15 handbook. This edition of the handbook similarly contained an Employment Arbitration Policy
16 and was distributed to all employees via the Company's interoffice mail system. True and correct
17 copies of pertinent excerpts from the 2004 handbook are attached hereto as Exhibit I.


18 11. On April 5, 2004, during Ms. Denes' employment, and in connection with the
19 merger of The St. Paul Companies and Travelers Property Casualty Corp., the Company (through
20 its Senior Vice President, Human Resources, John Clifford) sent an e-mail to all employees
21 regarding various employment policies, including with respect to the Company's Internal Dispute
22 Resolution and Employment Arbitration Policies. A true and correct copy of this e-mail is attached
23 as Exhibit J. The version of the Employment Arbitration Policy referred to in the e-mail is the
24 version attached hereto as Exhibit I.

25 12. In April 2005, during Ms. Denes' employment, Travelers re-issued its Internal
26 Dispute Resolution and Employment Arbitration Policies and distributed them to all employees via
27 the Company's interoffice mail. These policies were also posted on the Company's Intranet for
28 ///

1 ready and ongoing access to all employees. True and correct copies of the 2005 policies are
2 attached hereto as Exhibit K.

3 I declare under penalty of perjury under the laws of the United States and the States of
4 Connecticut and California that the foregoing is true and correct.

5 Executed on this 9 day of November, 2007, in Hartford, Connecticut.

6
7 
8 Diane Bengston